

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C. A. No. 05-823-SLR-LPS
	)	
STANLEY TAYLOR, et al.,	)	JURY TRIAL REQUESTED
	)	
Defendants.	)	

**DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME  
OUT OF TIME PURSUANT TO FED. R. CIV. P. 6(b)2**

Defendants Stanley Taylor, Joyce Talley, Tony Figario, Carl Anson, Michael Knight, Chris Senato, Joseph Atkins, Debbie Melvin, Richard Crockett, Richard Manuel, Weston White, Steven Raynor and Bethany Evans ("Defendants"), by and through undersigned counsel, respectfully request this Honorable Court to enter an Order granting an enlargement of time of an additional eight days within which to file a consolidated Reply Brief. In support of this motion, Defendants offer the following:

1. Defendants previously requested a ten (10) day extension of time to reply to the submissions of three Plaintiffs in this matter. The submissions were docketed as "Answering Briefs" in D.I.264,265 and 266.
2. On June 30, 2008, the day Defendants were to file their Reply Brief, they received a submission from another Plaintiff, Rique Reynolds, also in opposition to the Defendants' motion for summary judgment. D.I.270.
3. On July 1, 2008, another Plaintiff (Carl Walker) submitted a declaration in opposition to Defendants' motion for summary judgment. D.I.271.

4. On July 2, 2008, Plaintiff Darwin Savage's declaration against the Defendants' motion for summary judgment was docketed by the Clerk of Court. D.I.272.

5. In the interests of judicial economy, because the Plaintiffs' submissions contain common issues, Defendants wish to submit a single reply brief to deal with these six (6) responses to their motion for summary judgment.

6. This is the Defendants' second request for an extension of time to file Reply Briefs in this matter. As indicated above, the purpose of the extension is to file a consolidated reply brief; as an extension of time is not required to respond to the most recently filed documents. D.I.270,271,272.

7. A proposed form of order is attached to this motion that will grant the Defendants an extension until July 8, 2008, in which to file the Defendants' Reply Brief.

WHEREFORE, for the hereinabove reasons, the Defendants respectfully request that the Court grant the herein motion for an extension of time and set the deadline for filing a response for July 8, 2008.

**STATE OF DELAWARE  
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi  
Catherine Damavandi, ID #3823  
Deputy Attorney General  
Department of Justice  
820 N. French St. 6<sup>th</sup> Fl.,  
Wilmington, DE 19801  
(302)577-8400  
Attorney for Defendants

Dated: July 3, 2008

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C. A. No. 05-823-SLR-LPS
	)	
STANLEY TAYLOR, et al.,	)	JURY TRIAL REQUESTED
	)	
Defendants.	)	

**7.1.1 CERTIFICATION OF COUNSEL**

The counsel for the Defendants, Deputy Attorney General Catherine Damavandi, files this certification in compliance with Rule 7.1.1 of the Local Rules of Civil Procedure and certifies that:

1. Plaintiffs are inmates incarcerated in the Delaware Correctional system, at the Sussex Correctional Institution and the Delaware Correctional Center.
2. Since the Plaintiffs are not able to be reached by telephone counsel for the Defendants has spent no time in attempting to reach an agreement on the subject of the motion for enlargement of time.
3. She assumes the motion is opposed.

DEPARTMENT OF JUSTICE  
STATE OF DELAWARE

/s/ Catherine Damavandi  
Catherine Damavandi, ID #3823  
Deputy Attorney General  
820 N. French St. 6<sup>th</sup> Fl.,  
Wilmington, De 19801  
(302)577-8400  
Attorney for Defendants

Dated: July 3, 2008

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C. A. No. 05-823-SLR-LPS
	)	
STANLEY TAYLOR, et al.,	)	JURY TRIAL REQUESTED
	)	
Defendants.	)	

***CERTIFICATE OF SERVICE***

I hereby certify that on July 3, 2008, I electronically filed *Defendants' Motion for Enlargement of Time Out of Time to File Reply Briefs* with the Clerk of Court using CM/ECF. I further certify that on July 3, 2008, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

/s/ Catherine Damavandi  
Catherine Damavandi, ID#3823  
Deputy Attorney General  
Department of Justice  
820 N. French St., 6<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 577-8400  
catherine.damavandi@state.de.us

***List of Non-Registered Parties***

Charles Blizzard  
SBI #166670  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

John F. Davis  
SBI #263753  
16513 Coastal Hwy  
Lewes, DE 19958

Jerome Green  
SBI# 147772  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

James Johnson  
SBI 155123  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Timothy L. Malloy  
SBI #171278  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Howard Parker  
SBI # 165324  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Rique Reynolds  
SBI# 266486  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Darwin A. Savage  
SBI #232561  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Roderick Brown  
SBI# 315954  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Lawrence B. Dickens  
SBI #124570  
Sussex Correctional Center  
P.O. Box 500  
Georgetown, DE 19947

George A. Jackson  
SBI #171250  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Samuel Jones  
SBI# 465297  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Anthony Morris  
SBI# 300363  
Delaware Correctional Center  
1181 Paddock Road  
Smyrna, DE 19977

Eldon Potts  
SBI# 211193  
22602 Piney Branch Court  
Lincoln, DE 19960

Charles B. Sanders  
SBI #160428  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Jose Serpa  
SBI# 350322  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Kevin Spivey  
SBI# 258693  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Roger Thomas  
SBI #292590  
22249 Cabbage Pond Road  
Lincoln, DE 19960

Vernon Truitt  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Carl Walker  
SBI #173378  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Joseph White  
SBI#082985  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Frank Williams  
SBI #261867  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Gilbert Williams  
SBI# 137575  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Roy R. Williamson  
SBI #291856  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Adrian Wright  
SBI #169921  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947

Darus Young  
SBI# 00282852  
SUSSEX CORRECTIONAL INSTITUTE  
P.O. Box 500  
Georgetown, DE 19947